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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14

15 Judy Beaumont,

16 Plaintiff,

17 v.
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19 US Department of Homeland Security,
20 *et. al.*,
21 Defendants.

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Case No. 2:18-cv-00393-APG-CWH

Stipulation for Stay
(First Request)

15 The parties, through their counsel of record, hereby stipulate to stay this matter for a
16 period of 60 days, or until **February 11, 2019**. The parties are in active settlement
17 negotiations and believe they will be able to resolve this matter without continued
18 litigation. This is the first request to stay this matter, and the stipulation is not sought for
19 purposes of delay or any other improper purpose. Rather, the parties request a stay to
20 permit them to focus their time and resources on settlement discussions.

21 While the parties are optimistic they will be able to resolve this matter, they reserve
22 the opportunity to request an early settlement conference with either the assigned
23 magistrate judge or another magistrate judge, as determined by the Court, should they be
24 unable to resolve this matter during the course of the stay. To that end, the parties' request
25 that the Court schedule a status conference, to be automatically vacated in the event of
26 resolution, shortly after expiration of the stay. In advance of the status conference, the
27 parties will submit a joint status report indicating whether an early settlement conference
28 would be beneficial or proposing new discovery deadlines.

1 **WHEREFORE**, the parties respectfully request that this stipulation be granted and
2 the case stayed until **February 11, 2019**, and that the Court set a Status Conference, at a
3 time and date convenient to the Court, shortly after expiration of the stay.

4 Respectfully submitted this 13th day of December 2018.

5 THE COTTLE FIRM

6 /s/ Matthew G. Holland
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10 *Attorney for Plaintiff*

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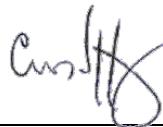
Attorneys for the United States

CHRISTOPHER M. YOUNG, PC

/s/ Christopher M. Young
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Attorney for Clark County

IT IS SO ORDERED:



~~UNITED STATES DISTRICT JUDGE~~
~~UNITED STATES MAGISTRATE JUDGE~~

DATED: December 17, 2018